

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BRUCE RUSH, as a participant in and on behalf of the Segerdahl Corporation employee stock ownership plan, and on behalf of a class of all others who are similarly situated,

Plaintiff,

v.

GREATBANC TRUST COMPANY;  
MARY LEE SCHNEIDER; RICHARD  
JOUTRAS; RODNEY GOLDSTEIN;  
PETER MASON; ROBERT CRONIN;  
JOHN DOE DEFENDANTS 1-10; and  
SEGERDAHL CORP. (d/b/a SG360),

Defendants.

Case No.: 1:19-cv-00738

Judge Andrea R. Wood  
Magistrate Judge Susan E. Cox

**JOINT STATUS REPORT**

Plaintiff Bruce Rush, as a participant in and on behalf of Segerdahl Corporation employee stock ownership plan and as representative of the Certified Class (“Plaintiff”) and Defendants GreatBanc Trust Company (“GreatBanc”), Mary Lee Schneider, Richard Joutras, Rodney Goldstein, Peter Mason, Robert Cronin, and the Segerdahl Corporation d/b/a SG360 (“Segerdahl Defendants”) (collectively “Defendants,” and together with Plaintiff the “Parties”), by and through counsel undersigned, hereby respectfully submit this Joint Status Report and Proposed Scheduling Stipulation to revise the case deadlines set out in the Court’s order dated July 29, 2021 (Dkt. 192).

The Court’s minute entry dated November 16, 2021 (Dkt. 196) ordered the Parties to file a joint status report confirming the scheduling of the remaining expert depositions before December 31, 2021 and whether the Parties are on track to file dispositive and Daubert motions as scheduled on January 14, 2022.

The Parties report that they have exchanged opening and rebuttal expert reports in conformity with the Court's order dated July 29, 2021, and all depositions are scheduled to be completed by the end of 2021.

However, because of the holidays and the need to coordinate schedules with counsel and six experts (three for Plaintiff and three for Defendants) expert discovery is scheduled to be completed by December 23, 2021, instead of December 10, 2021, as originally set by the Court's July 29, 2021 order. Accordingly, Defendants request a short extension on dispositive and *Daubert* briefing and do not believe that those extensions are likely to be prejudicial to the prompt, efficient and fair resolution of this case. Plaintiff does not oppose Defendants' request for additional time.

Accordingly, Defendants respectfully request that the Court amend the current case deadlines as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed New Deadline</b>
Dispositive and <i>Daubert</i> Motions	January 14, 2022	January 28, 2022
Responses to Dispositive and <i>Daubert</i> Motions	February 18, 2022	March 5, 2022
Replies in Support of Dispositive and <i>Daubert</i> Motions	March 11, 2022	April 1, 2022

Since briefing dispositive motions is now imminent, Plaintiff believes that it would facilitate prompt, speedy and just resolution of this matter to set a trial date now, with trial to begin on a date convenient for the Court after the time the Court intends to rule on the dispositive and *Daubert* motions. Plaintiff believes that this case will be ready for trial after the conclusion of expert discovery, and believes that expert testimony has confirmed Plaintiff's position that summary judgment would be entirely inappropriate in this matter. (Docket No. 117).

Defendants agree that any trial date should be set after ruling on the dispositive and

*Daubert* motions. Defendants do not agree that setting a trial date at this time would be appropriate, however, since any date will depend on when the Court resolves these motions in light of its docket, and whether a trial is needed after that resolution. Defendants believe expert discovery has confirmed the flaws in Plaintiffs' claims.

Dated: December 7, 2021

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system on December 7, 2021, and that all parties are represented by counsel of record registered with the CM/ECF system.

/s/ Robert W. Rachal